

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE  
EASTERN DIVISION**

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**MONSANTO COMPANY and  
MONSANTO TECHNOLOGY, LLC.,**

**Plaintiff,**

**vs**

**NO. 10-cv-1290-egb**

**SOUTHFORK FARMS, LLC,  
SCOTT ROLAND and  
WILLIAM (aka "BUBBA") L. JOHNSON  
Defendants.**

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**ANSWER TO COMPLAINT FOR DAMAGES AND  
INJUNCTIVE RELIEF**

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**COMES NOW** the defendant, SCOTT ROLAND, by and through his attorney of record, David W. Camp and for answer to the Complaint for Damages and Injunctive Relief heretofore filed against him would state unto the Court as follows:

1. Paragraph 1 of the Complaint is neither denied nor admitted and the defendant would demand strict proof of the same;
2. Paragraph 2 of the Complaint is neither denied nor admitted and the defendant would demand strict proof of the same;
3. Paragraph 3 of the Complaint is neither denied nor admitted and the defendant would demand strict proof of the same;

4. Paragraph 4 of the Complaint is neither denied nor admitted and the defendant would demand strict proof of the same;
5. Paragraph 5 of the Complaint is neither denied nor admitted and the defendant would demand strict proof of the same;
6. Paragraph 6 of the Complaint is neither denied nor admitted and the defendant would demand strict proof of the same;
7. Paragraph 7 of the Complaint is neither denied nor admitted and the defendant would demand strict proof of the same;
8. Paragraph 8 of the Complaint is neither denied nor admitted and the defendant would demand strict proof of the same;
9. Paragraph 9 of the Complaint is neither denied nor admitted and the defendant would demand strict proof of the same;
10. Paragraph 10 of the Complaint is admitted;
11. Paragraph 11 of the Complaint is admitted;
12. Paragraph 12 of the Complaint is admitted as to the defendant Scott Roland;
13. Paragraph 13 of the Complaint is neither denied nor admitted and the defendant would demand strict proof of the same;
14. Paragraph 14 of the Complaint is neither denied nor admitted and the defendant would demand strict proof of the same;

15. Paragraph 15 of the Complaint is neither denied nor admitted and the defendant would demand strict proof of the same;
16. Paragraph 16 of the Complaint is neither denied nor admitted and the defendant would demand strict proof of the same;
17. Paragraph 17 of the Complaint is neither denied nor admitted and the defendant would demand strict proof of the same;
18. Paragraph 18 of the Complaint is neither denied nor admitted and the defendant would demand strict proof of the same;
19. Paragraph 19 of the Complaint is neither denied nor admitted and the defendant would demand strict proof of the same;
20. Paragraph 20 of the Complaint is neither denied nor admitted and the defendant would demand strict proof of the same;
21. Paragraph 21 of the Complaint is neither denied nor admitted and the defendant would demand strict proof of the same;
22. Paragraph 22 of the Complaint is neither denied nor admitted and the defendant would demand strict proof of the same;
23. Paragraph 23 of the Complaint is denied as to the defendant Scott Roland;
24. Paragraph 24 of the Complaint is neither denied nor admitted and the defendant would demand strict proof of the same;

25. Paragraph 25 of the Complaint is neither admitted nor denied in that defendant Scott Roland did not give permission or consent to take a sampling of his fields and defendant Scott Roland would demand strict proof of the same;
26. Paragraph 26 of the Complaint is neither denied nor admitted and the defendant would demand strict proof of the same;
27. Paragraph 27 of the Complaint is neither denied nor admitted and the defendant would demand strict proof of the same;
28. Paragraph 28 of the Complaint is neither denied nor admitted and the defendant would demand strict proof of the same;
29. Paragraph 29 of the Complaint is neither denied nor admitted and the defendant would demand strict proof of the same;
30. Paragraph 30 of the Complaint is neither denied nor admitted and the defendant would demand strict proof of the same;
31. Paragraph 31 is denied as to defendant Scott Roland;
32. Paragraph 32 is denied as to defendant Scott Roland;
33. Paragraph 33 is denied as to defendant Scott Roland;
34. Paragraph 34 of the Complaint is neither denied nor admitted and the defendant would demand strict proof of the same;

35. Paragraph 35 of the Complaint is neither denied nor admitted and the defendant would demand strict proof of the same;
36. Paragraph 36 of the Complaint is neither denied nor admitted and the defendant would demand strict proof of the same;
37. Paragraph 37 of the Complaint is neither denied nor admitted and the defendant would demand strict proof of the same;
38. Paragraph 38 of the Complaint is neither denied nor admitted and the defendant would demand strict proof of the same;
39. Paragraph 39 of the Complaint is neither denied nor admitted and the defendant would demand strict proof of the same;
40. Paragraph 40 of the Complaint is denied as to defendant Scott Roland;
41. Paragraph 41 of the Complaint is denied as to defendant Scott Roland;
42. Paragraph 42 of the Complaint is denied as to defendant Scott Roland;
43. Paragraph 43 of the Complaint is neither denied nor admitted and the defendant would demand strict proof of the same;
44. Paragraph 44 of the Complaint is neither denied nor admitted and the defendant would demand strict proof of the same;
45. Paragraph 45 of the Complaint is neither denied nor admitted and the defendant would demand strict proof of the same;

46. Paragraph 46 of the Complaint is neither denied nor admitted and the defendant would demand strict proof of the same;
47. Paragraph 47 of the Complaint is neither denied nor admitted and the defendant would demand strict proof of the same;
48. Paragraph 48 of the Complaint is neither denied nor admitted and the defendant would demand strict proof of the same;
49. Paragraph 49 of the Complaint is denied as to defendant Scott Roland;
50. Paragraph 50 of the Complaint is denied as to defendant Scott Roland;
51. Paragraph 51 of the Complaint is denied as to defendant Scott Roland;
52. Paragraph 52 of the Complaint is neither denied nor admitted and the defendant would demand strict proof of the same;
53. Paragraph 53 of the Complaint is neither denied nor admitted and the defendant would demand strict proof of the same;
54. Paragraph 54 of the Complaint is neither denied nor admitted and the defendant would demand strict proof of the same;
55. Paragraph 55 of the Complaint is denied as to defendant Scott Roland;
56. Paragraph 56 of the Complaint is denied as to defendant Scott Roland;
57. Paragraph 57 of the Complaint is denied as to defendant Scott Roland;
58. Paragraph 58 of the Complaint is neither denied nor admitted and the defendant would demand strict proof of the same;

59. Paragraph 59 of the Complaint is denied as to defendant Scott Roland;
60. Paragraph 60 of the Complaint is denied as to defendant Scott Roland;
61. Paragraph 61 of the Complaint is denied as to defendant Scott Roland;
62. Paragraph 62 of the Complaint is denied as to defendant Scott Roland;
63. Paragraphs 63 through 66 of Count VII require no response by defendant Scott Roland;
64. Any and all allegations contained within the Plaintiff's complaint to which there has neither been an admission or denial, are hereby denied.

**NOW, HAVING FULLY ANSWERED** the Complaint for Damages and Injunctive Relief filed against him, the defendant, Scott Roland, prays that the complaint be dismissed and that the plaintiff be taxed with the cost of this cause.

Respectfully submitted,

s/ Randy C. Camp

RANDY C. CAMP (BPR #007036)

LAW OFFICES OF DAVID W. CAMP, PLLC

Attorney for Defendant Scott Roland

403 North Parkway, Suite 101

Jackson, Tennessee 38305

(731) 664-4499

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing document has been forwarded by electronic filing to:

Lewis L. Cobb, PBR #005369  
SPRAGINS, BARNETT & COBB, PLC  
P.O. Box 2004, 312 E. Lafayette Street  
Jackson, TN 38302  
731-424-0461  
FAX 731-424-0562

s/Randy C. Camp  
RANDY C.CAMP  
11/29/10  
DATE